

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

DOROTHY A. LANGFORD

Plaintiff,

VS.

McDONALD'S CORPORATION

Defendant.

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CASE NO. 2:06-cv-1025-WKW

JOINT CONSENT MOTION FOR EXTENSION OF
TIME FOR PARTIES TO CONDUCT MANDATORY
FACE-TO-FACE SETTLEMENT CONFERENCE

COME NOW Defendant McDonald's Corporation ("McDonald's") and Plaintiff Dorothy A. Langford ("Langford"), and respectfully request an extension of time in which to conduct their face-to-face settlement conference and file their report thereof with this Court. As grounds therefore, the parties state the following:

1. Plaintiff filed her Complaint in the United States District Court for the Middle District of Alabama against McDonald's on November 15, 2006. Defendant filed its Answer and Defenses to Plaintiff's Complaint on December 21, 2006.

2. Thereafter, pursuant to this Court's Order of January 4, 2007, the parties filed their Report of Parties Planning Meeting with this Court in accordance with Federal Rule of Civil Procedure 26(f) (the "Report"). This Court adopted the parties'

Report in its Scheduling Order of February 6, 2007, in which this Court also set forth requirements for the parties' face-to-face settlement conference.

3. Defendant's counsel consulted with Plaintiff's counsel regarding the face-to-face settlement conference on March 1, 2007, at which time the parties agreed to file this Consent Motion requesting an extension of time in which to conduct their face-to-face settlement conference and file their report thereof with this Court.

4. This extension is requested in good faith for the following reasons:

a. Plaintiff and Plaintiff's counsel are evaluating the dismissal of Defendant McDonald's Corporation based upon the receipt of additional information from the company;

b. Plaintiff is amending her Complaint to add an additional party, that being the franchise restaurant, which may, upon further consideration of the information referenced above, contribute to the decision of Plaintiff to voluntarily dismiss Defendant McDonald's Corporation from this case; and

c. This request is not interposed for the purpose of delay, and no prejudice will result to any party from the granting of this request.

WHEREFORE, Defendant McDonald's Corporation and Plaintiff Dorothy A. Langford respectfully request that this Court grant

the parties' Consent Motion, and furnish them an extension of time in which to conduct their face-to-face settlement conference and file their report thereof with this Court in the above-styled cause. A proposed Order is attached hereto as Exhibit "A" for this Court's consideration.

This 2nd day of March, 2007.

Respectfully submitted,

s/ Jack L. McLean, Jr.
Jack L. McLean, Jr.
Georgia Bar No. 496855
Admitted Pro Hac Vice

OF COUNSEL:

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Defendant McDonald's Corporation

s/ Jackson B. Harrison
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Attorney for Plaintiff
Dorothy A. Langford

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 2, 2007, I electronically filed this **JOINT CONSENT MOTION FOR EXTENSION OF TIME FOR PARTIES TO CONDUCT MANDATORY FACE-TO-FACE SETTLEMENT CONFERENCE** with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorney of record:

Jackson B. Harrison
The Harrison Law Firm, LLC
8425 Crossland Loop
Montgomery, Alabama 36117
lisaandbrett96@yahoo.com

This 2nd day of March, 2007.

Respectfully submitted,

s/ Jack L. McLean, Jr.

Jack L. McLean, Jr.

Georgia Bar No. 496855

Admitted Pro Hac Vice

One of the Attorneys for
Defendant McDonald's
Corporation

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